

Attorney for Debtor(s),
Walsh, John and Brianne

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA

In re:)	Case No.:	17-90001
)	Chapter 13 Proceeding	
JOHN ALBRO WALSH III)	D.C. No.:	MSN-002
BRIANNE ELIZABETH WALSH)		
)		
Debtor(s).)		

EX PARTE MOTION TO REOPEN CHAPTER 13 BANKRUPTCY CASE TO FILE 11 U.S.C.
§1328 CERTIFICATE

Debtors, John and Brianne Walsh, by and through their attorney of record, Mark S. Nelson, hereby moves the Court for an Order Ex Parte reopening Debtors' bankruptcy case to file their 11 U.S.C. §1328 Certificate.

The Ex Parte Motion is premised on the following:

1. Debtors' filed their Voluntary Chapter 13 Bankruptcy Petition on January 3, 2017.
2. Debtors made all payments that came due pursuant to their Chapter 13 Plan.
3. On September 18, 2019, the Chapter 13 Trustee filed the Notice to Debtor of Completed Plan Payments and of Obligation to File Documents.
4. Due to an oversight by Debtors' attorney's office, Debtors' 11 U.S.C. §1328 Certificate (Form EDC 3-190) was not timely filed with the Court.

Debtors, John and Brianne Walsh, case be closed with entry of a Chapter 13 Discharge; and as such other and further relief as the Court deems necessary and proper.

/S/ MARK S. NELSON
MARK S. NELSON, ESQ.
Attorney for Debtors.